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Baker

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March 10, 1993

Commanding Officer
Atlantic Division
Naval Facilities Engineering Command
Building N-26, Naval Station
Norfolk, Virginia 23511-6287

Attn: Mr. Byron Brant, P.E.
Engineer-in-Charge
Code 1823

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0106
RI/FS Project Plans for Operable Unit No. 5
MCB Camp Lejeune, North Carolina

Dear Mr. Brant:

Attached are responses to comments submitted by the U.S. Environmental Protection Agency, Region IV. These comments pertain to the Draft Final RI/FS Project Plans for Site 2 (Operable Unit No. 5) at MCB Camp Lejeune. Also enclosed is a disc which contains the responses (file name: C106RESP).

Baker is revising the Draft Final Project Plans in accordance with the attached responses. We anticipate that the Final RI/FS Project Plans will be submitted on or before March 12, 1993.

If you have any questions, please do not hesitate to contact me at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Raymond P. Wattras

Raymond P. Wattras
Project Manager

RPW/nd
Attachment
Enclosure

cc: Ms. Lee Anne Rapp, P.E., Code 183 (w/o attachment)
Mr. Keith Simmons, P.E., Code 0223 (w/o attachment)
Mr. Neal Paul (CLEJ)

Response to Comments Submitted by the
U.S. Environmental Protection Agency, Region IV
on the Draft Final RI/FS Work Plan and Sampling and
Analysis Plan for Operable Unit No. 5 (Site 2),
MCB Camp Lejeune, North Carolina
Comment Letter Dated 2/11/93

Response to General Comments - Work Plan

1. Figure 2-1 has been revised to include all Installation Restoration Program sites at MCB Camp Lejeune.

2. Three additional sampling locations (for full TCL organics/TAL inorganics) have been included north of Building 712, in accordance with the comment (Figure 5-1 and Table 5-1 have been revised along with the text in Section 5.3.2). For the entire operable unit, 16 of the 57 test borings will include full TCL organics and TAL inorganics analysis (surface and subsurface soil samples). Given the small size of the site, sixteen samples is sufficient to characterize potential risks to human health and the environment.

   Additional surface water/sediment samples will be analyzed for full TCL organics/TAL inorganics. Figures 5-4 and 5-5 have been revised along with Table 5-1 and Section 5.3.5.

3. Attached to this response summary is a groundwater contour map. This figure was developed using only one round of groundwater elevations. Groundwater flow direction at Site 2 is reportedly southeast, based on this one round of static water level measurements. Groundwater flow direction needs further evaluation prior to developing groundwater contour maps. Water level measurements for the site monitoring wells will be recorded periodically during the field investigation phase of the RI. Groundwater contour maps will be included in the RI report.

Response to Specific Comments - Work Plan

1. Table 2-4 has been revised; the "proposed" designation for barium was eliminated.

2. The NCWQS for iron has been revised on Table 2-4.

3. See response to General Comment No. 2.

Response to Specific Comments - Sampling and Analysis Plan

1. See response to General Comment No. 2.

2. See response to General Comment No. 2. In general, the waste handling activities at Site 2 are well documented. Quantities of pesticides used at the site are reported in the Work Plan, based on background information obtained from previous reports/files.

   With respect to the comment that previous investigations did not include full analysis, Baker obtained samples from three of the five monitoring wells for full TCL organics and TAL inorganics analysis prior to developing the RI/FS Work Plan.

3. See response to General Comment No. 2.

4. Changes to the Sampling and Analysis Plan have been made with respect to the type of water for QA/QC blanks. All blank water will be organic-free and deionized.

5. The Navy reserves the right to utilize PVC wells on a case by case basis. Baker obtained samples from three of the five monitoring wells for full TCL organics and TAL inorganics analysis prior to developing the RI/FS Work Plan. Only low levels of organics were detected. The use of PVC should not result in false positives or false negatives if proper sampling techniques (purging, etc.) are applied.

6. Soil cuttings will not be stockpiled on-site. This section has been revised. All soil cuttings will be containerized.

7. Section 5.2.1 has been revised in accordance with the comment.